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July 5, 2022

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### **VIA ECF**

Honorable Juan R. Sanchez, U.S.C.J.  
United States District Court, Eastern District of Pennsylvania  
James A. Byrne United States Courthouse  
Room 14613  
Philadelphia, Pennsylvania 19106-1797

**Re: Xavier Ingram v. County of Camden, et al.  
Civil Action No.: 1:14-cv-05519**

Dear Judge Sanchez:

I write in response to Mr. Cook's letter filed this afternoon regarding plaintiff's Motion to Enforce settlement which is returnable on July 18, 2021. I strenuously object to defendants' request to stay this motion indefinitely, or alternatively to deny it without prejudice. Defendants agreed to settle this case on May 6, 2021 for \$10 million dollars without any further conditions. Nevertheless, Defendants have insisted on including in their proposed General Release numerous terms and conditions which were never discussed nor agreed to, many of which are onerous and improper. Moreover, to date, they have steadfastly refused to make any of the changes I requested to their General Release. In the meantime, Mr. Ingram remains in the nursing home without any of his settlement funds available to address his financial obligations and as needed to move forward with his life.

While I am appreciative of the efforts made by Magistrate Carlos to work through the points of disagreement, as she noted previously, she has no authority to force the defendants to agree to the terms proposed. Nevertheless, after I filed the Motion to Compel on June 23, 2022, I spoke with Judge Carlos late last week, and over this past holiday weekend I sent her the requested changes to plaintiff's proposed General Release. In the meantime, there is no assurance that the defendants will now agree to any of the changes, most of which have been on the table since early June. Delaying this motion will only further delay the settlement.

Honorable Juan R. Sanchez, U.S.C.J.

July 5, 2022

Page 2

I have no objection to Mr. Cook filing his opposition to the pending motion late, instead of today. However, I would request he file it by this Friday, July 8, 2022, and that this motion remain scheduled before Your Honor for Monday, July 18, 2022.

I thank Your Honor for your time and attention to this matter.

Respectfully,

**MAZIE SLATER KATZ & FREEMAN, LLC**

*s/ Beth G. Baldinger*

BETH G. BALDINGER

cc: All Counsel of Record

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